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2
3 UNITED STATES DISTRICT COURT
4 DISTRICT OF MASSACHUSETTS
5 CIVIL ACTION NO. 4:21-CV-10572-TSH
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7 KPM ANALYTICS NORTH AMERICA CORPORATION,)
8 Plaintiff,)
9 vs.)
10 BLUE SUN SCIENTIFIC, LLC, THE INNOVATIVE)
11 TECHNOLOGIES GROUP & CO., LTD., ARNOLD)
12 EILERT, MICHELLE GAJEWSKI, ROBERT)
13 GAJEWSKI, RACHAEL GLENISTER, GREGORY)
14 ISRAELSON, IRVIN LUCAS, AND PHILIP OSSOWSKI,)
15 Defendants.)

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17 REMOTE VIDEOTAPED DEPOSITION OF
18 BLUE SUN SCIENTIFIC, LLC, BY IRVIN R. LUCAS, IV,
19 called as a witness by and on behalf of the
20 Plaintiff, pursuant to the applicable provisions of
21 the Federal Rules of Civil Procedure, Rule
22 30(b)(6), before P. Jodi Ohnemus (remotely), RPR,
23 RMR, CRR, NH-LSR #91, MA-CSR #123193 and CA-CSR
24 #13192, at Los Angeles, California, on Tuesday,
25 July 6, 2021, commencing at 7:02 a.m. (PDT).

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1 Q. Why did he address the email to both you
2 at Blue Sun and Mr. Israelson at Unity?

3 A. 'Cause, like I had mentioned previously,
4 Mr. Israelson had assisted Kent in doing
5 calibrations for the R&R instrumentation. So it
6 looks as if he copied his Unity email address here.

7 Q. And that was because R&R was looking for
8 an OEM supplier?

9 A. That's correct.

10 Q. And KPM had declined to be such a
11 supplier?

12 A. That's correct.

13 MR. GUTKOSKI: Okay. Let's look at what
14 we'll mark as Exhibit 18, 37 on our list.

15 (Exhibit 18, email 3/1/2021,
16 KPM0002588-2590.)

17 A. Okay. I have this document open.

18 Q. Okay. So this is a document produced by
19 KPM. It's on pages produced at KPM 2588 through
20 2590. I'd like to direct you to the email --
21 beginning of the email chain on page 2590.

22 A. Okay.

23 Q. Do you recognize these emails?

24 A. No, I do not.

25 Q. Do you see there's an attachment to a